REMARKS

Claims 1-35 were previously pending in this patent application. Claims 1-35 stand rejected. Accordingly, after this Amendment and Response, Claims 1-35 remain pending in this patent application. Further examination and reconsideration in view of the arguments set forth below is respectfully requested.

OATH/DECLARATION

The Oath/Declaration is objected to because a signature of the second inventor is missing (Ali Tabatabai).

A Declaration signed by the first inventor (Hawley Rising III) has already been submitted. In the Appendix to this paper, a Declaration signed by the second inventor (Ali Tabatabai) is submitted herein.

SPECIFICATION

According to the Office Action, the title of the invention is descriptive but is lengthy. A new title is required that is clearly indicative of the invention.

The title has been amended as suggested in the Office Action.

35 U.S.C. Section 112, first paragraph, Rejections

Claims 1-35 stand rejected under 35 U.S.C. Section, first paragraph, as containing subject matter which was not described in the specification in such a way as to enable one skilled in the art to which it pertains, or with which it is most nearly connected, to make and/or use the invention. In particular, in Claims 1, 10, 19, and 28, "retrieving one or more of a plurality of component semantic descriptions stored remotely" and "associating with content data" were considered unclear because it was unclear how exactly the separately stored descriptions of components are associated with one another. Moreover, it was stated that "generating said semantic description using said one or more component semantic descriptions" was not described in the claims or specification in such a way as to enable one skilled in the art to which it pertains to make and/or use the invention.

It is submitted that Claims 1-35 contain subject matter which is described in the specification in such a way as to enable one skilled in the art to which it pertains, or with which it is most nearly connected, to make and/or use the invention. In particular, the specification describes the creation of a semantic description for content data using multiple component semantic descriptions stored remotely from the content data. Reference information can be associated with the content data, whereas the reference information includes the identity of the component semantic descriptions needed to form the semantic description, the location of these component semantic descriptions, and the manner of processing these component semantic descriptions to form the semantic

description. When the semantic description is desired, the component semantic descriptions identified in the reference information are retrieved (e.g., from a location on a network, a control dictionary, etc.). Then, the semantic description is formed in the manner specified in the reference information using the component semantic descriptions. Thus, the semantic description does not have to be stored in a discrete location, saving storage resources and promoting re-use of component semantic descriptions. (Specification, page 30, line 18- page 31, line 7). In light of the above arguments, withdrawal of the rejection of Claims 1-35 is respectfully requested.

35 U.S.C. Section 112, second paragraph, Rejections

Claims 1-35 stand rejected under 35 U.S.C. Section, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. In particular, it was stated that the phrase "component semantic descriptions" was indefinite.

It is submitted that Claims 1-35 are definite and particularly point out and distinctly claim the subject matter which applicants regard as the invention. The phrase "component semantic descriptions" is definite. It is well understood in the field that "semantic descriptions" describe the underlying meaning or understanding of the content data. In particular, a goal, advertisement, and Madonna are examples of a semantic description. Other examples of semantic descriptions includes a storyline for a movie (e.g., content data), a description of a scene in the movie, a description of an image, a description of a piece of music, etc. The word "component" modifies the words "semantic descriptions",

conveying the notion that a "component semantic description" is used with other "component semantic descriptions" to form the complete semantic description. This is analogous to a puzzle (e.g. the complete semantic description) and a piece (e.g., component semantic description) of the puzzle. In light of the above arguments, withdrawal of the rejection of Claims 1-35 is respectfully requested.

35 U.S.C. Section 102(e) Rejections

Claims 1-35 stand rejected under 35 U.S.C. 102(e) as being anticipated by Vaithilingam et al., U.S. Patent No. 6,411,724 (hereafter Vait). These rejections are respectfully traversed.

Independent Claim 1 recites:

> A method of forming a semantic description for content data, comprising the steps of:
> a) retrieving one or more of a plurality of component semantic descriptions stored remotely from said content data according to reference information associated with said content data; and
> b) *generating said semantic description using said one or more component semantic descriptions and said reference information.* (emphasis added)

It is respectfully asserted that Vait does not disclose the present invention as recited in Independent Claim 1. In particular, Vait is directed to retrieving from a multimedia repository multimedia information (e.g., content data) using meta-descriptors in addition to descriptors by a query method. [Vait; Abstract]. In Vait, a descriptor is a representation of a feature, a feature being a distinctive characteristic of multimedia information (e.g., content data), while a meta-

descriptor is information about the descriptor. [Vait; Abstract] .However, Vait does not describe generating a semantic description for content data using one or more component semantic descriptions and the reference information associated with the content data.

Unlike Vait, Independent Claim 1 is directed to a method of forming a semantic description for content data, whereas the method includes retrieving one or more of a plurality of component semantic descriptions stored remotely from the content data according to reference information associated with the content data, and generating the semantic description using the one or more component semantic descriptions and the reference information. While Vait is directed at retrieving the content data using semantic descriptions, Independent Claim 1 is directed to a generating a semantic description for content data using one or more component semantic descriptions and the reference information associated with the content data. Therefore, it is respectfully submitted that Independent Claim 1 is not anticipated by Vait and is in condition for allowance.

Dependent Claims 2-9 are dependent on allowable Independent Claim 1, which is allowable over Vait. Hence, it is respectfully submitted that Dependent Claims 2-9 are patentable over Vait for the reasons discussed above.

With respect to Independent Claim 10, it is respectfully submitted that Independent Claim 10 recites similar limitations as in Independent Claim 1. In particular, the computer-executable instructions stored in the memory device of

the computer system of Independent Claim 10 perform a method that includes generating a semantic description for content data using one or more component semantic descriptions and the reference information associated with the content data. Therefore, Independent Claim 10 is allowable over Vait for reasons discussed in connection with Independent Claim 1.

Dependent Claims 11-18 are dependent on allowable Independent Claim 10, which is allowable over Vait. Hence, it is respectfully submitted that Dependent Claims 11-18 are patentable over Vait for the reasons discussed above.

With respect to Independent Claim 19, it is respectfully submitted that Independent Claim 19 recites similar limitations as in Independent Claim 1. In particular, the semantic description for content data of Independent Claim 19 is formed using one or more component semantic descriptions and the reference information associated with the content data. Therefore, Independent Claim 19 is allowable over Vait for reasons discussed in connection with Independent Claim 1.

Dependent Claims 20-27 are dependent on allowable Independent Claim 19, which is allowable over Vait. Hence, it is respectfully submitted that Dependent Claims 20-27 are patentable over Vait for the reasons discussed above.

With respect to Independent Claim 28, it is respectfully submitted that Independent Claim 28 recites similar limitations as in Independent Claim 1. In particular, the method of Independent Claim 28 includes generating a semantic description for content data using one or more component semantic descriptions. Therefore, Independent Claim 28 is allowable over Vait for reasons discussed in connection with Independent Claim 1.

Dependent Claims 29-35 are dependent on allowable Independent Claim 28, which is allowable over Vait. Hence, it is respectfully submitted that Dependent Claims 29-35 are patentable over Vait for the reasons discussed above.

CONCLUSION

It is respectfully submitted that the above amendments, arguments and remarks overcome all rejections and objections. For at least the above presented reasons, it is respectfully submitted that all remaining claims (Claims 1-35) are now in condition for allowance.

The Examiner is urged to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account number: 23-0085.

Respectfully submitted,

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Dated: 8/14/2003

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